

ATTACHMENT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

STEVEN BRADLEY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:23-cv-01100
)	
GANNETT CO., INC.,)	
)	
Defendant.)	
)	

DECLARATION OF RANA L. CASH

I, Rana L. Cash, hereby depose and state:

1. I am currently employed as the Executive Editor of the Charlotte Observer. I joined the Observer in that position in October 2021. Before accepting employment from the Observer, I was employed as the Executive Editor of the Savannah Morning News from June 2020 to October 2021. In that role my employer was GateHouse Media Georgia Holdings, Inc. d/b/a The Savannah Morning News. I make this declaration on personal knowledge.

2. At the time I was hired by the Savannah Morning News, Barbara Augsdorfer was covering Bryan and Effingham Counties, which are suburban counties around Savannah. I understood that she was doing so on a basis other than as a full-time employee – either as a part-time employee or a freelance contract. I was told that the outgoing Executive Editor, Susan Catron, had agreed to hire Ms. Augsdorfer as a full-time reporter covering education, and I was asked to honor that agreement. I hired Ms. Augsdorfer as I understood Ms. Catron had requested for the education beat, which was one of the highest profile beats the Morning News covered.

3. As I understand it, Ms. Augsdorfer's job covering education was her first full-time newspaper reporting job.

4. I understand that the Complaint in this case cites a column I wrote for the Morning News shortly after I joined the paper.¹ In that column I wrote:

Today, the Savannah Morning News editorial department – reporters, editors, photographers and digital producers – has three people of color on its staff, including me. I am the paper's executive editor and became the first Black person to hold the title here when I was hired in June. The staff includes one Hispanic journalist and one Black digital content producer.

The "Hispanic journalist" referred to in this paragraph is Ms. Augsdorfer. A true and correct copy of the column is attached hereto at Tab A.

5. In early conversations with Ms. Augsdorfer, as we tried to get to know each other, we spoke about our backgrounds and our families. Among other things, Ms. Augsdorfer told me about her Hispanic heritage; as I recall, she told me that her grandparents were Mexican.

6. I found Ms. Augsdorfer very affable with a strong work ethic. She cared about her reporting and worked hard to produce good stories despite her lack of a formal journalism background.

7. Unfortunately, despite her effort, Ms. Augsdorfer's work was not satisfactory. She had difficult, abrasive relationships with sources; her articles about school board meetings would overlook important subjects; she missed important stories that should have been reported; her work regularly required extensive editing. I asked her to read stories written by education reporters at other publications to get a sense of what such stories should look like, and pointed

¹ Rana L. Cash, "On matters of race, our newsroom has fallen short. Here's how we'll be better for Savannah," Savannah Morning News, Aug. 20, 2020, available at <https://www.savannahnow.com/story/special/2020/08/20/on-matters-of-race-ournewsroom-has-fallen-short-herersquos-how-wersquoll-be-better-forsavannah/114851796/>.

her to publications on education journalism. As I recall I offered to have the Morning News pay for subscriptions to those publications for her.

8. I wanted Ms. Augsdorfer to succeed in her role but her work did not improve. My leadership team urged me to terminate her employment, but I was reluctant to do so.

9. The turning point for me was an occasion when Ms. Augsdorfer was working on a story for which she could not find sources on the school board, and so asked a fellow reporter who had a child in high school whether she could interview the reporter for her story.

10. I then put Ms. Augsdorfer on a 60-day performance improvement plan. As I recall the sequence, I changed Ms. Augsdorfer's assignment back to the coverage of Bryan County and Effingham County after it was clear that the performance improvement plan would not be successful. I understand that Ms. Augsdorfer alleges in the Complaint in this case that her assignment was changed before she was put on the performance improvement plan, but as I recall it, I put her on the plan in the hope that her work would improve so I would not have to change her assignment.

11. I also understand that Ms. Augsdorfer alleges that the change in assignment was not a result of performance problems but because of the "necessity" of covering Bryan and Effingham Counties. This is not correct; the education beat was far more important than covering those two suburban counties. I changed Ms. Augsdorfer's assignment for performance reasons, not because coverage of the counties was somehow more necessary.

12. When I did change her assignment to the county reporting, Ms. Augsdorfer's pay rate did not change.

13. I hired Bianca Moorman to take on the education beat after changing Ms. Augsdorfer's assignment. I did not work with Ms. Moorman, however, because I left Savannah to take my current position with the Charlotte Observer before Ms. Moorman began work.

14. When I left the Savannah Morning News, Ms. Augsdorfer was still employed there. My successor, Jill Nevels, made the decision to terminate Ms. Augsdorfer's employment.

I declare under penalty of perjury that the foregoing is true and correct.

11/20/2023

Date

Rana Cash

Rana L. Cash

EXHIBIT A

 **savannahnow** | Savannah Morning News.

SPECIAL

On matters of race, our newsroom has fallen short. Here's how we'll be better for Savannah

Rana L. Cash rcash@gannett.com

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We would like to believe that in Savannah, where Black leadership, culture and history form a beautiful tapestry, issues of race so pervasive in other parts of America are either absent or insubstantial here.

Lots of evidence supports that perspective.

The mayor is Black. So is the chief of police and the school superintendent. Five Black women sit on the City Council. Savannah State University, an historically Black college, produces degreed young people prepared for challenging, professional careers.

Signs abound that suggest Georgia's oldest city, founded in 1733 by a man who prohibited slavery in his colony, is no longer burdened by the horrifying legacy of "the weeping time." Generations and centuries later, Black Savannah is flourishing.

But that's not the story in its entirety.

There remain substantial shortfalls in our progress. One of those is us, the Savannah Morning News.

Though we boast a proud and astounding 170-year history in the Hostess City of the South, our newsroom does not reflect many of the voices, faces and experiences of the community we so dutifully represent as public servants.

In our work as journalists, we insist on transparency. We strive to reveal untold truths and demand elected officials be accountable to those trusting them to fight for their best interests.

It's time we hold ourselves to the same standard.

Today, the Savannah Morning News editorial department – reporters, editors, photographers and digital producers – has three people of color on its staff, including me. I am the paper's executive editor and became the first Black person to hold the title here when I was hired in June. The staff includes one Hispanic journalist and one Black digital content producer.

In a city that is 54% Black according to censusreporter.org, the newsroom is 17.6% diverse. The greater coverage area of the Savannah Morning News, including Effingham and Bryan counties, is 59.1% white, 28.5% Black, 7.9% Hispanic, 1.9% Asian and 2.2% two or more races. The community-wide data, from the 2019 American Community Service Survey, is produced by the U.S. Census Bureau.

Two shifts must take place to level our footing in the community.

First, we will take advantage of the limited hiring opportunities that arise to diversify our newsroom while also seeking grants and partnerships to grow our team. Our industry faces immense challenges brought on by a markedly different business model that has shifted the most essential revenue source from advertising to growing subscribers. That difficulty is exacerbated tenfold by the pandemic. This means we must find new and creative ways to change the face of our company.

We will work harder to add people of color and LGBTQ journalists to our ranks and by 2025 have a newsroom that looks like our city.

That brings us to the second important change. It is impossible to cover topics such as public safety, housing, local government, education, health care, the environment and criminal justice and not acknowledge the dynamics of race. Even in Savannah. Especially in Savannah.

While many are thriving in Black communities, others are grappling with the pain of gun violence and the hopelessness of abject poverty. Access to affordable housing and reliable health care is not the same for all the city's residents. Education is not always equal.

Mayor Van Johnson, following the local protest held after the killing of George Floyd in Minneapolis and Ahmaud Arbery in Brunswick, has created a task force called REAL – Racial Equity and Leadership – whose mission is to deal with racial inequities in the city.

We will cover the efforts of this group. But we won't start or stop there.

At the Savannah Morning News, we will examine disparities in Black and brown communities held up by deeply rooted and often misunderstood forms of systemic racism.

This will be in the DNA of what we do every day.

We won't drift into these issues but will be intentional in earnest pursuits of well-reported stories that bring to the surface gaps routinely buried and ignored.

This is not to the exclusion of any work, but an essential component of our long-lasting efforts.

Our journalists will use all our digital and print platforms, as well as public forums, to drive conversations about problems and solutions. We want you to be participants in those conversations, joining us on podcasts and videos, writing opinion pieces, sending in letters to the editor and engaging with us and our readers on social media. We want to -- need to -- hear your ideas.

We know those often most committed to change aren't typically in front of cameras or in boardrooms. Rather, it is often the grassroots work of community organizers who pull back the curtain on problems hurting our neighbors.

Our hope is that our reporting will be the light that floods dark corners and illuminates the brightest stars.

How our newsroom demographics compare to Savannah

17.6%

of our newsroom employees are people of color

40.9%

of people in our community are people of color

47.1%

of our newsroom employees are female

51.2%

of people in our community are female